

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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JADA WINTERS,

Case No.: 23-cv-1668

Plaintiff,

-against-

PHOUNTAIN PH HOLDINGS CORP. and PATRICK
COOLEY,

**DECLARATION OF
JOSEPH MYERS**

Defendants.

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I, **JOSEPH MYERS**, an attorney licensed by the State of New York and admitted to practice in the United States District Court of the Eastern District of New York, do hereby certify the following:

1. I am an Associate with the firm, Phillips & Associates, PLLC, the attorneys for Plaintiff, Jada Winters, ("Plaintiff") in the above-entitled action, and as such, am fully familiar with the facts and circumstances contained herein.
2. I submit this Declaration in support of Plaintiff's Motion for Default Judgment against Defendant Phountain PH Holdings Corp.
3. Attached hereto as exhibits are the following:
 - a. Exhibit A – Complaint;
 - b. Exhibit B – Clerk's Certificate of Default;
 - c. Exhibit C – Court's Order dated January 18, 2024;
 - d. Exhibit D – Court's Order dated March 7, 2024; and
 - e. Exhibit E – Proposed Default Judgment.

WHEREFORE, for the reasons set forth in accompanying Memorandum of Law, Plaintiff respectfully requests that the Court grant Plaintiff's Motion for Default Judgment against Defendant

Phountain PH Holdings Corp.

Dated: Garden City, New York
April 29, 2024

Respectfully Submitted,

/s/ Joseph Myers

Joseph Myers, Esq.

Phillips & Associates, PLLC

Attorneys for Plaintiff

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